

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Lead Case]

LULAC PLAINTIFFS' PRETRIAL DISCLOSURES

Plaintiffs LULAC, et al., ("LULAC Plaintiffs") hereby submit the following Pretrial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Pretrial Scheduling Order (Dkt. 880). LULAC Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate.

I. WITNESSES

LULAC Plaintiffs' Witness List is set forth in **Exhibit A** attached hereto. LULAC Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial. Accordingly, LULAC Plaintiffs reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call its witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on Defendants' witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or

lay the foundation for the introduction of documents to which Defendant objects; (4) reasonably supplement or amend this Witness List through and including the time of trial to the extent permitted by the Court; (5) introduce deposition testimony as impeachment evidence; or (6) change a witness from a live witness to a witness testifying by deposition, and vice versa. LULAC Plaintiffs also reserve the right to supplement or modify this witness list in response to rulings made by the Court. LULAC Plaintiffs' identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.¹

II. TRIAL EXHIBITS

LULAC Plaintiffs' Preliminary Trial Exhibit List is set forth in **Exhibit B** attached hereto. LULAC Plaintiffs reserve the right to introduce in evidence any documents identified by Defendants or any other plaintiff in their pre-trial disclosures and to introduce additional documents as rebuttal or impeachment evidence. LULAC Plaintiffs also reserve the right to introduce in evidence any exhibits that are offered as joint exhibits but regarding which the parties do not reach agreement.

LULAC Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which will be identified and exchanged at a mutually agreeable time prior to trial. LULAC Plaintiffs will serve their objections to Defendants' trial exhibit list and any additional trial exhibits in accordance with the Court's Pretrial Scheduling Order.

¹ Pursuant to the parties' agreement, the parties will exchange deposition designations as required under Federal Rule of Civil Procedure 26(a)(3) for any witnesses testifying by deposition on May 7, 2025.

Date: May 2, 2025

Respectfully submitted,

/s/ Nina Perales

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Counsel for LULAC Plaintiffs

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 2nd day of May 2025.

/s/ Nina Perales

Nina Perales

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR THE
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LULAC PLAINTIFFS' WITNESS LIST

LULAC Plaintiffs identify the following live witnesses in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(i):

WITNESS	MAY CALL	WILL CALL
State Representative Ana Maria Ramos Capitol Room E2.312, P.O. Box 2910, Austin, TX 78768 (512) 463-0454	X	
Angelica Razo Ms. Razo may be contacted through LULAC Plaintiffs' undersigned counsel.		X
State Representative Armando Walle Representative Walle may be contacted through counsel, Joaquin Gonzalez, Mexican American Legislative Caucus, 1108 Lavaca Street, Suite 110-		X

WITNESS	MAY CALL	WILL CALL
351 Austin, TX 78701. (512) 463-0740		
Art Fierro Art Fierro may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	X	
Bobbie Garza Hernandez Ms. Garza Hernandez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	X	
Candace Valenzuela 3925 St. Christopher Lane, Dallas, TX 75287 (915) 637-9617		X
State Representative Cassandra Garcia Hernandez Representative Garcia Hernandez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	X	
Cesar Espinosa Mr. Espinosa may be contacted through LULAC Plaintiffs' undersigned counsel.		X
State Representative Chris Turner 320 Westway Place, Suite 501, Arlington, TX 7601	X	
State Representative Claudia Ordaz Perez Capitol Room E2.802, P.O. Box 2910, Austin, TX 78768 (512) 463-0622		X
State Representative Christina Morales Capitol Room E2.404, P.O. Box 2910, Austin, TX 78768		X

WITNESS	MAY CALL	WILL CALL
(512) 463-0732		
David Lopez Mr. Lopez may be contacted through LULAC Plaintiffs' undersigned counsel.		X
Diana Martinez Alexander Ms. Alexander may be contacted through LULAC Plaintiffs' undersigned counsel.		X
Domingo Garcia Mr. Garcia may be contacted through LULAC Plaintiffs' undersigned counsel.		X
State Representative Eddie Morales Capitol Room E2.816, P.O. Box 2910, Austin, TX 78768 (512) 463-0566		X
State Representative Gene Wu Representative Wu may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	X	
Ina Minjarez Ina Minjarez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.		X
Jeanette Martinez 3928 Townsend Dr. Fort Worth, Texas 76110 817-714-5771	X	
Jessica Mejia Ms. Mejia may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Suite 300, San Antonio, TX 78205.		X
JoAnn Acevedo		

WITNESS	MAY CALL	WILL CALL
Ms. Acevedo may be contacted through LULAC Plaintiffs' undersigned counsel.		X
State Representative Joe Moody Representative Moody may be contacted through counsel, Joaquin Gonzalez, Mexican American Legislative Caucus, 1108 Lavaca Street, Suite 110-351 Austin, TX 78701. (512) 463-0740.		X
Joey Cardenas Mr. Cardenas may be contacted through LULAC Plaintiffs' undersigned counsel.	X	
Kristian Carranza 1327 Mission Grande Apt. 6, San Antonio, TX 78221. 210-551-1313.		X
Leo Pacheco 639 Kopplow Pl., San Antonio, TX 78221 (210) 771-2301		X
State Representative Lina Ortega Capitol Room E2.204, P.O. Box 2910, Austin, TX 78768. (512) 463-0638.		X
Maida Guillen 2618 Strait Lane, Houston, TX (512) 791-9317	X	
State Representative Mary Ann Perez Representative Perez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	X	

WITNESS	MAY CALL	WILL CALL
State Representative Mary Gonzalez Representative Gonzalez may be contacted through counsel, Joaquin Gonzalez, Mexican American Legislative Caucus, 1108 Lavaca Street, Suite 110-351 Austin, TX 78701. (512) 463-0740		X
State Representative Nicole Collier 101 S. Jennings Suite 103A, Fort Worth, Texas 76104	X	
Norma Cavazos Ms. Cavazos may be contacted through Chad Dunn, counsel for Brooks Plaintiffs.	X	
State Representative Penny Morales Shaw Capitol Room E1.416, P.O. Box 2910, Austin, TX 78768 (512) 463-0620		X
State Representative Rafael Anchia 1111 West Mockingbird Lane, Suite 1010, Dallas, TX 75247.		X
State Representative Ramon Romero Capitol Room E2.322, P.O. Box 2910, Austin, TX 78768 (512) 463-0740		X
Salvador Espino Mr. Espino may be contacted through LULAC Plaintiffs' undersigned counsel.		X
Vincent Perez	X	

WITNESS	MAY CALL	WILL CALL
Mr. Perez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.		

LULAC Plaintiffs identify the following witnesses whose testimony will be presented through deposition in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(ii). Transcripts of the pertinent portions of each witness' deposition will be filed in accordance with the Court's order granting the parties' Joint Motion to Extend Deadline to Exchange Deposition Designations.²

WITNESS	WILL PRESENT THROUGH DEPOSITION
Andrew Murr	X
State Representative Brooks Landgraf	X
Jacey Jetton	X
State Representative John Lujan	X

² See Text Order Granting ECF No. 923, Motion to Extend Scheduling Order Deadlines. May 2, 2025.

EXHIBIT B

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LULAC PLAINTIFFS' EXHIBIT LIST

LULAC PLAINTIFFS' EXHIBIT NO.	DESCRIPTION
PL_LULAC 1	Expert Report of Dr. Bernard Fraga, dated March 31, 2025
PL_LULAC 2	Second Supplemental Expert Report of Dr. Cristina Morales, dated March 31, 2025
PL_LULAC 3	Supplemental and Amended Expert Report of Dr. Cristina Morales, dated August 1, 2022
PL_LULAC 4	Supplemental and Amended Expert Report of Dr. Maria Cristina Morales, dated June 15, 2022
PL_LULAC 5	Supplemental Expert Report on the Socioeconomic Characteristics of the Latino Population in Texas of Dr. Rogelio Saenz, dated March 31, 2025

PL_LULAC 6	Expert Report on the Socioeconomic Characteristics of the Latino Population in Texas of Dr. Rogelio Saenz, dated May 20, 2022
PL_LULAC 7	Expert Report of Dr. Andrés Tijerina, dated May 20, 2022
PL_LULAC 8	U.S. Census, Texas Population Change by County, 2010-2020 by race and ethnicity
PL_LULAC 9	U.S. Census, Texas Population Change, 2010-2020 by race and ethnicity Bexar County Elections, Precinct Results, HD118, 2020 General Election
PL_LULAC 10	Texas Demographic Center, Demographic Trends and Characteristics: Texas and the Hispanic Population, August 29, 2023
PL_LULAC 11	Bexar County Elections, Precinct Results, HD118, 2018 General Election
PL_LULAC 12	Bexar County Elections, Precinct Results, HD118, 2020 General Election
PL_LULAC 13	Bexar County Elections, Precinct Results, HD118, November 2, 2021 Runoff Election
PL_LULAC 14	Bexar County Elections, Precinct Results, HD118, 2022 General Election
PL_LULAC 15	Bexar County Elections, Precinct Results, HD118, 2024 General Election
PL_LULAC 16	Demonstrative Map, Precinct Results, HD118, 2018 General Election

PL_LULAC 17	Demonstrative Map, Precinct Results, HD118, 2020 General Election
PL_LULAC 18	Demonstrative Map, Precinct Results, HD118, November 2, 2021 Runoff Election
PL_LULAC 19	Demonstrative Map, Precinct Results, HD118, 2022 General Election
PL_LULAC 20	Demonstrative Map, Precinct Results, HD118, 2024 General Election
PL_LULAC 21	Bexar County Elections, Precinct SСТО, HD118, 2018 General Election
PL_LULAC 22	Bexar County Elections, Precinct SСТО, HD118, 2020 General Election
PL_LULAC 23	Bexar County Elections, Precinct SСТО, HD118, November 2, 2021 Runoff Election
PL_LULAC 24	Bexar County Elections, Precinct SСТО, HD118, 2022 General Election
PL_LULAC 25	Bexar County Elections, Precinct SСТО, HD118, 2024 General Election
PL_LULAC 26	Demonstrative Map, Precinct SСТО, HD118, 2018 General Election
PL_LULAC 27	Demonstrative Map, Precinct SСТО, HD118, 2020 General Election
PL_LULAC 28	Demonstrative Map, Precinct SСТО, HD118, November 2, 2021 Runoff Election

PL_LULAC 29	Demonstrative Map, Precinct SSTO, HD118, 2022 General Election
PL_LULAC 30	Demonstrative Map, Precinct SSTO, HD118, 2024 General Election
PL_LULAC 31	Map, Bexar County Independent School Districts
PL_LULAC 32	Demonstrative Map, Bexar County House districts in H2100 and H2316
PL_LULAC 33	City of Houston, Super Neighborhoods Map
PL_LULAC 34	John Lujan Deposition Exhibits 2-20
PL_LULAC 35	Brooks Landgraf Deposition Exhibits 2, 4, 16-17, 22-23